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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JENNIFER P. SCHWEICKERT,

Plaintiff,

vs.

HUNTS POINT VENTURES, INC.; HUNTS POINT VENTURE GROUP, LLC; CHAD and ELIZABETH RUDKIN, and their marital community comprised thereof; JOHN DU WORS and AMBER DU WORS, and their marital community comprised thereof; and DOES 1-4,

Defendants.

No. 13-CV-675RSM

DECLARATION OF SAM B.  
FRANKLIN IN SUPPORT OF  
DEFENDANT JOHN DU WORS'  
OPPOSITION TO JOYCE  
SCHWEICKERT'S AND T. JEFFREY  
KEANE'S MOTION TO QUASH  
SUBPOENAS AND FOR SANCTIONS

NOTE ON MOTION CALENDAR:  
September 26, 2014

I, Sam B. Franklin, being an adult over the age of 18 and of sound mind do hereby declare under the laws of perjury in the State of Washington, the following facts to be true and correct:

1. I am one of the attorneys representing Defendants John Du Wors and Amber Du Wors.

2. I did not assume the attorney client privilege had been waived between Mr. Yurchak and Jennifer Schweickert or Mr. Yurchak and Mark Phillips or Mr. Keane and Joyce Schweickert in sending the Apple and Google Subpoenas in this matter. I am seeking

DECLARATION OF SAM B. FRANKLIN IN SUPPORT  
OF DEFENDANT JOHN DU WORS' OPPOSITION TO  
JOYCE SCHWEICKERT'S AND T. JEFFREY  
KEANE'S MOTION TO QUASH SUBPOENAS AND  
SANCTIONS - 1

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LEE SMART

P.S., Inc. • Pacific Northwest Law Offices

1800 One Convention Place • 701 Pike Street • Seattle • WA • 98101-3929  
Tel. 206.624.7990 • Toll Free 877.624.7990 • Fax 206.624.5944

communications particularly between these various parties; Jennifer Schweickert and Joyce Schweickert; Joyce Schweickert and Mark Phillips.

3. Attached to this Declaration as **Exhibit 1** is a true and correct copy of the Declaration of Service of both the Google and Apple Subpeonas.

DATED this 22nd day of September, 2014.

By: s/Sam B. Franklin  
Sam B. Franklin, WSBA No. 1903  
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Attorneys for Defendants Du Wors

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## CERTIFICATE OF SERVICE

I hereby certify that on the date provided at the signature below, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individuals:

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 22 day of September, 2014, at Seattle, Washington.

Marie V. Sharpe  
Marie Vestal Sharpe, Legal Assistant

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